

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BRUCE CRAIGIE and
BARBARA CRAIGIE,

Case No. 1:15-cv-00441

Plaintiffs,

Hon. Janet T. Neff

v.

NATIONSTAR MORTGAGE, LLC,
a limited liability company, and
JOHN DOES 1-5,

Defendants.

Theodore J. Westbrook (P70834)
Amanda P. Narvaes (P74957)
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Nationstar Mortgage, LLC
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MOTION TO COMPEL
ORAL ARGUMENT REQUESTED

Plaintiffs Bruce and Barbara Craigie (“Plaintiffs” or the “Craiges”), through their undersigned counsel and pursuant to Fed. R. Civ. P. 26(b), 34 and 37, hereby move for an order compelling Defendant Nationstar Mortgage, LLC (“Defendant” or “Nationstar”) to supplement its answers to Plaintiffs’ First Set of Discovery Requests, in support of which Plaintiffs state as follows:

1. On August 11, 2015, the Craiges served a copy of Plaintiffs’ First Set of Discovery Requests on Nationstar via email and First Class mail, making Defendants’ response due by September 14, 2015.

2. On August 25, 2015 Plaintiffs stipulated to Nationstar’s request for a two-week extension of the deadline to respond to Plaintiffs’ First Set of Discovery Requests. On September 25, 2015, Plaintiffs stipulated to an additional, one-week extension of the deadline, making Nationstar’s responses due on October 2, 2015.

3. On October 2, 2015, Nationstar responded by objecting to each and every Interrogatory posed; Nationstar did not adequately respond to any Interrogatory.

4. Nationstar failed to provide documents as requested, and failed to provide a privilege log despite claiming that a portion of the responsive documents are subject to attorney-client privilege and/or trade secret privilege.

WHEREFORE, Plaintiffs request that this Court enter an order:

- a. Compelling Nationstar to provide complete written responses (as opposed to objections) to Plaintiff’s Interrogatories Nos. 2-5 and 7-8;
- b. Compelling Nationstar to produce all non-privileged responsive documents in response to Plaintiffs’ Requests for Production Nos. 2, 4-11 and 14-16; and

- c. Compelling Nationstar to produce a privilege log listing each responsive document to which Nationstar alleges that a discovery privilege attaches.

Respectfully submitted,

Dated: November 13, 2015

/s/Theodore J. Westbrook

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CERTIFICATE OF SERVICE

I certify that on November 13, 2015, the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.

Dated: November 13, 2015

/s/Theodore J. Westbrook

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